



June 29, 2017

*Via Electronic Filing*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Starry, Inc. Notice of Ex-Parte Communication; Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN Docket No. 14-177, IB Docket Nos. 15-256 and 97-95; RM-11664; and WT Docket No. 10-112***

Dear Ms. Dortch:

On June 27, 2017, Starry, Inc., represented by Chet Kanojia, Chief Executive Officer, Joseph Lipowski, Chief Technology Officer and Virginia Lam Abrams, Senior Vice President of Communications & Government Relations, participated in a meeting at the Federal Communications Commission ("Commission") with the Wireless Telecommunications Bureau represented by Bureau Chief Donald Stockdale, Joel Taubenblatt, John Schauble, and Matt Pearl.

During the meeting, Starry briefed the Wireless Bureau on Starry's proprietary 5G fixed wireless technology and the company's deployment progress in Boston. Starry discussed its technology architecture and shared information regarding its experience building out its network and operating in various weather and seasonal conditions in the millimeter wave bands.

During the meeting, Starry also reiterated its support for preserving sharing in the lower 37 GHz band as proposed in the *Spectrum Frontiers Report & Order*, advocating that a simple, site-based coordination mechanism be utilized. Starry believes that implementing a sharing framework in this band that utilizes a site-based model, rather than licensing by a geographic area, takes advantage of the unique characteristics of the band, namely its limited propagation, that allow for more spectrum re-use.

The development of the 5G technology market is still nascent. Starry believes it is critical that the Commission employ a diverse set of spectrum licensing models – including sharing, unlicensed and exclusively licensed – to encourage the maximum amount of innovation in these millimeter wave bands. The Commission has substantial experience and success with implementing site-based coordination systems and Starry believes using this

simple approach will be the most effective in unleashing this spectrum into the marketplace, while preserving the ability for the Commission to refine the sharing mechanism in the future, as these technologies evolve.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. We have also provided a copy of this letter electronically to all Commission personnel who were in attendance. Please contact the undersigned with any questions.

Respectfully submitted,  
Virginia Lam Abrams  
Starry, Inc.

cc:  
Donald Stockdale  
Joel Taubenblatt  
John Schauble  
Matt Pearl